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May 30, 2012

By ECF

Honorable Robert M. Levy
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Government Employees Insurance Co., et al v. Edovard J. Hazel, M.D., et al.
Docket No. CV 11-0410 (CBA)(RML)

Dear Magistrate-Judge Levy:

As Your Honor is aware, we are counsel to the Plaintiffs in this matter.

On May 7, 2012, Plaintiffs filed a letter requesting a pre-motion conference for the purposes of seeking permission to move, pursuant to Fed. R. Civ. Proc. 37(b)(2), for an order striking the Answers of defendants, Ruslan Erlikh (“Ruslan”), Igor Erlikh (“Igor”) and Precision Office Management, Inc. (“Precision”) (collectively the “Management Defendants”) (See Docket No. 53). As the Court is aware, the Management Defendants have disregarded Your Honor’s Order requiring they obtain new counsel and/or appear in the action pro-se. Once again, we respectfully request that Your Honor schedule a pre-motion conference. In the event that Your Honor does not feel that a pre-motion conference is necessary, then we would respectfully request that the Court endorse this request and permit the motion to be filed within 20 days.

The Court’s attention to this application is appreciated.

Respectfully submitted,

RIVKIN RADLER LLP



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cc: Honorable Carol B. Amon-U.S.D.J.

All counsel via ECF

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